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**GRANT & EISENHOFER
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November 21, 2018

VIA HAND DELIVERY

The Honorable George B. Daniels
United States District Judge
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007-1312

Re: *In re JPMorgan Chase & Co. Sec. Litig.*, No. 12-cv-3852(GBD) (S.D.N.Y.)
Motion for Modification of Order Approving Distribution Plan

Dear Judge Daniels:

We represent the Court-appointed Lead Plaintiffs in the above-captioned securities action. We write concerning our motion, filed today, requesting that the Court modify its Distribution Order to permit the payment of four claims that the claims administrator has determined to be valid.

By Order entered January 8, 2018 (the “Distribution Order”) (ECF No. 231), the Court approved Lead Plaintiffs’ distribution plan for the proceeds of the settlement achieved in the Action and authorized the initial distribution to approved claimants. The Initial Distribution occurred on March 13, 2018.

As explained in our motion papers, subsequent to the Initial Distribution, the claims administrator learned of four claims that were timely filed and valid but had inadvertently not been included in the claims administrator’s final reports presented to the Court in support of Lead Plaintiffs’ Motion for Approval of Distribution Plan. These claims did not receive a distribution from the settlement proceeds.

Lead Plaintiffs are therefore respectfully moving the Court to modify the Distribution Order so as to permit payment on the above-referenced claims. Under the terms of the Distribution Order, the Court retained jurisdiction to consider any further applications concerning the administration of the settlement. Distribution Order ¶ 4.

Enclosed are courtesy copies of the following documents that were filed and served today on all counsel of record via the Court’s electronic Case Filing (ECF) system.

- (i) Lead Plaintiffs’ Notice of Motion for Modification of Order Approving Distribution Plan;

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- (ii) Lead Plaintiffs' Memorandum in Support of Motion for Modification of Order Approving Distribution Plan;
- (iii) Declaration of Justin R. Hughes in Support of Lead Plaintiffs' Motion for Modification of Order Approving Distribution Plan;
- (iv) [Proposed] Order Modifying Order Approving Distribution Plan; and
- (v) Certificate of Service.

We thank the Court for its attention to this matter.

Respectfully submitted,

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Co-Lead Counsel for Lead Plaintiffs and the Class

cc: All counsel of record (via ECF)